

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Docket No. 1:13-md-2419-RWZ

THIS DOCUMENT RELATES TO:

All Cases

**JOINT STIPULATION FOR EXTENSION OF TIME FOR INVOKING
DEFENDANTS TO RESPOND TO ST. THOMAS ENTITIES' MOTION TO COMPEL**

Pursuant to Section A of MDL Order No. 11 (MDL No. 1524), the St. Thomas Entities¹ (“St. Thomas”) and Barry Cadden, Gregory Conigliaro, Douglas Conigliaro, Carla Conigliaro and Glenn Chin (the “Invoking Defendants”) hereby stipulate jointly as follows:

1. On July 30, 2015, St. Thomas filed a Motion to Compel Invoking Defendants to Produce Certain Documents (the “Motion”) (MDL No. 2117). St. Thomas agrees to an extension of time for the Invoking Defendants to respond to the Motion. The parties have agreed that the Invoking Defendants’ response(s) to the Motion shall be filed on or before August 28, 2015.²
2. The Invoking Defendants assent to reply briefing by St. Thomas.

¹ Saint Thomas Health, Saint Thomas Network, and Saint Thomas West Hospital, formerly known as St. Thomas Hospital.

² On July 31, 2015, Defendants BKC Pain Specialists, Inc., Cincinnati Pain Management Consultants, Ltd., APAC Centers for Pain Management/Advanced Pain Anesthesia Consultants, P.C., James Molnar, M.D., Gururau Sudarshan, M.D., Anne Tuttle, M.D., Saud Siddiqui, M.D., Lori Sheets, LPN, Meena Chadha, Randolph Chang, M.D., Adil Katabay, M.D., and Nikesh Batra, M.D. (“Ohio Clinic Defendants”) filed a Motion to Join the St. Thomas Motion. (MDL No. 2126.) The Ohio Clinic Defendants are Impacted Parties under MDL Order No. 11, and counsel for those defendants has been notified of this extension.

Dated: August 13, 2015

Respectfully submitted,

(For the Invoking Defendants)
GREGORY CONIGLIARO
By his attorneys,

/s/ Dan Rabinovitz

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THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
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CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2015, a true copy of the foregoing was filed in accordance with the Court's Electronic Filing Guidelines and will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ John K. Wells

John K. Wells, Esq.